

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB (LJC)

_____/

This Order Relates To:

ALL ACTIONS

**MASTER PRIVILEGE DETERMINATIONS
CLAWBACK CATEGORY 2**

July 18, 2025

Master Privilege Determinations
Clawback Category 2
July 18, 2025

	Control Number	Privilege Claim	Uber's Privilege Description	Plaintiff's Privilege Log Challenge Rationale	Master's Determination	Reasoning
1	JCCP_MDL_PRIVLOG073003	Attorney-Client	Redacted confidential PowerPoint seeking and providing legal advice from in-house counsel regarding in-app features to advance rider safety.	While Plaintiffs did not originally challenge this document, Plaintiffs challenge Uber's recent Clawback additional redactions	Produce with New Redactions	Only some of the redacted portions reflect legal advice. Uber is ordered to produce the document with the following redactions removed: p. 325, p. 348, p. 393, p. 446 - for all only after the word "and;" p. 383.
2	JCCP_MDL_PRIVLOG077627	Attorney-Client	Redacted confidential e-mail thread discussing legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	While Plaintiffs did not originally challenge this document, Plaintiffs challenge Uber's recent Clawback additional redactions	Not Privileged	The new redactions concern information provided by Dan Svirsky. Mr. Svirsky is not included on Uber's list of counsel. There is no indication Mr. Svirsky is conveying advice provided to him by Uber's counsel. The document is not privileged.
3	JCCP_MDL_PRIVLOG077821	Attorney-Client	Confidential e-mail thread seeking and providing legal advice from in-house counsel regarding dash cameras.	Yes-no attorney on the email to seek or provide legal advice and Uber fails to identify attorney associated with communication	Produce with Uber's Proposed Redactions	The redacted portions convey or reflect legal advice. Uber's redactions are appropriate. See Dkt. 2005 at 5-6.
4	JCCP_MDL_PRIVLOG079412	Attorney-Client	Confidential attorney markup seeking and providing legal advice from in-house counsel regarding dash cameras.	Yes-this is an email-inaccurate document description, where no attorney is on the chain to provide legal advice.	Produce with Uber's Proposed Redactions	The redacted portions convey or reflect legal advice. Uber's redactions are appropriate. See Dkt. 2005 at 5-6.
5	JCCP_MDL_PRIVLOG083040	Attorney-Client; Work Product	Confidential chat prepared at the direction of counsel to facilitate rendering legal advice in anticipation of litigation regarding reports of driver sexual assault or sexual misconduct.	Yes-this is a non-attorney edits/comments on a policy document	Privileged	This communication contains information to facilitate the provision of legal advice and was made in connection with a document created in anticipation of litigation. Uber's submissions support this conclusion. See Dkt. 2985.
6	JCCP_MDL_PRIVLOG083042	Attorney-Client; Work Product	confidential document prepared at the direction of in-house counsel regarding Uber's policies and practices for responding to allegations of driver sexual assault or sexual misconduct.	Yes-this is a non-attorney edits/comments on a policy document	Privileged	This communication contains information to facilitate the provision of legal advice and was made in connection with a document created in anticipation of litigation. Uber's submissions support this conclusion. See Dkt. 2985.
7	JCCP_MDL_PRIVLOG083044	Attorney-Client; Work Product	confidential document seeking legal advice from in-house counsel regarding reports of driver sexual assault or sexual misconduct.	Yes-this is a non-attorney edits/comments on a policy document	Privileged	This communication contains information to facilitate the provision of legal advice and was made in connection with a document created in anticipation of litigation. Uber's submissions support this conclusion. See Dkt. 2985.

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8	JCCP_MDL_PRIVLOG083060	Attorney-Client	confidential PowerPoint memorializing legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes-redactions relate to business decisions not to launch the women perfer woman feature-dominant business purpose	Produce with Uber's Proposed Redactions	The redacted portions convey and reflect legal advice and analysis. Uber's submissions support this conclusion. See Dkt. 2985.
9	JCCP_MDL_PRIVLOG083064	Attorney-Client; Work Product	Redacted document prepared to facilitate rendering legal advice of in-house counsel in anticipation of litigation regarding reports of driver sexual assault or sexual misconduct.	Yes-Policy/Process document given to employees regarding the process of handling investigations related to cases- no legal advice actually given	Not Privileged	Uber represents in its submissions that this document is a protocol that was informed by counsel, however, that does not make the protocol itself privileged. See Dkt. 2168 at 5 ("That this policy was apparently informed by legal advice does not make the policy itself privileged. If it did, virtually all aspects of the functioning of any major corporation would be protected from disclosure."). Uber has not met its burden to establish that these redactions are privileged.
10	JCCP_MDL_PRIVLOG083066	Attorney-Client	Redacted confidential presentation memorializing legal advice from in-house counsel regarding use of cameras or recording devices in vehicles.	Yes no attorney is denoted as author or collaborator to contribute to the creation and Uber failed to identify attorney associated with redaction	Produce with New Redactions	Only part of the redacted portion reflects legal advice or analysis. Uber is ordered to produce the document with the redaction of the last sentence on the slide removed.
11	JCCP_MDL_PRIVLOG083068	Attorney-Client; Work Product	Redacted confidential Powerpoint reflecting legal advice and prepared in anticipation regarding reports of driver sexual assault or sexual misconduct.	Yes - the 3 slides before Legal and Litigation Update appear improper as they are before the section Uber discusses litigation updates and non-leagal related-business	Produce with New Redactions	Only some of the redacted portions reflect legal advice. Uber is ordered to produce the document with the redaction on p. 59 removed. Comments visible in the native file do not appear on p. 60 in the image file provided. The document should be reproduced with the attorney comments redacted.
12	JCCP_MDL_PRIVLOG083070	Attorney-Client; Work Product	Redacted confidential Powerpoint reflecting legal advice and prepared in anticipation regarding reports of driver sexual assault or sexual misconduct.	Yese - redactions from pg 57-60 relate to loss trends-business dominant information	Not Privileged	The challenged redacted portions do not reflect of convey legal advice. Uber has not met its burden to establish privilege.
13	JCCP_MDL_PRIVLOG083074	Attorney-Client; Work Product	confidential chat discussing legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes - no attorney a party to the chat - non-attorneys discussing process	Produce with New Redactions	Only some of the redacted portions convey or reflect legal advice. Uber is ordered to produce the document with only the legal advice reflected redacted.

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14	JCCP_MDL_PRIVLOG083076	Attorney-Client; Work Product	Confidential chat discussing reflecting legal advice from in-house counsel and prepared in anticipation of litigation regarding reports of driver sexual assault or sexual misconduct.	Yes-communication between non-attorneys; no legal advice sought or provided and, contrary to Uber's description of the document, this communication does not appear to reflect any legal advice.	Produce with New Redactions	Only some of the redacted portions reflect an intent to seek legal advice. Uber is ordered to produce the document with only the legal advice sought redacted.
15	JCCP_MDL_PRIVLOG083080	Attorney-Client; Work Product	Confidential chat prepared at the direction of counsel to facilitate rendering legal advice in anticipation of litigation regarding reports of driver sexual assault or sexual misconduct.	Yes - discussion between two non-attorneys but its about waitlisting/ process	Not Privileged	This communication does not convey or reflect legal advice and there is no indication it was prepared at the direction of counsel. Uber has not met its burden to establish this document is privileged.
16	JCCP_MDL_PRIVLOG083082	Attorney-Client; Work Product	Confidential chat prepared at the direction of counsel to facilitate rendering legal advice in anticipation of litigation regarding reports of driver sexual assault or sexual misconduct.	Yes-no attorney associated with the chat between two non-attorneys about a published news story-non-attorneys commenting on story no legal advice	Not Privileged	This communication does not convey or reflect legal advice and there is no indication it was prepared at the direction of counsel. Uber has not met its burden to establish the redactions in this document are privileged.
17	JCCP_MDL_PRIVLOG084704	Attorney-Client	Confidential e-mail thread seeking legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes. Email thread does not appear entirely privileged; thread includes emails in which attorney cc'd with many non-attorneys and/or emails and portions of emails in which legal advice is not sought or provided; email thread has dual purpose-primary purpose business operations (S-RAD evaluation). Uber should produce with appropriate redactions.	Produce with New Redactions	This document contains requests for legal advice and business advice. Uber is ordered to produce the document with the legal advice sought or reflected redacted.
18	JCCP_MDL_PRIVLOG084705	Attorney-Client	Confidential e-mail seeking legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes. Email thread does not appear entirely privileged; thread includes emails in which attorney cc'd with many non-attorneys and/or emails and portions of emails in which legal advice is not sought or provided; email thread has dual purpose-primary purpose business operations (S-RAD evaluation). Uber should produce with appropriate redactions.	Produce with New Redactions	This document contains requests for legal advice and business advice. Uber is ordered to produce the document with the legal advice sought or reflected redacted.

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19	JCCP_MDL_PRIVLOG085045	Attorney-Client	Confidential e-mail thread seeking and providing legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes. Email thread does not appear entirely privileged; thread includes emails in which attorney cc'd with many non-attorneys and in which legal advice is not sought or provided; email thread has dual purpose-primary purpose business operations (S-RAD launch/Phase 5 City holds). Uber should produce with appropriate redactions.	Privileged	Defendants have represented in their briefs and affidavits that this communication was sent for the purpose of obtaining and facilitating legal advice. Plaintiffs have not provided a sufficient basis to reach a different conclusion. Additionally, this document both seeks and conveys legal advice.
20	JCCP_MDL_PRIVLOG085056	Attorney-Client	Confidential e-mail seeking legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes. Email thread does not appear entirely privileged; thread includes emails in which attorney cc'd with many non-attorneys and in which legal advice is not sought or provided; email thread has dual purpose-primary purpose business operations (S-RAD launch/Phase 5 City holds). Uber should produce with appropriate redactions.	Privileged	Defendants have represented in their briefs and affidavits that this communication was sent for the purpose of obtaining and facilitating legal advice. Plaintiffs have not provided a sufficient basis to reach a different conclusion. Additionally, this document both seeks and conveys legal advice.
21	JCCP_MDL_PRIVLOG085057	Attorney-Client	Confidential e-mail seeking legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes. Email thread does not appear entirely privileged; thread includes emails in which attorney cc'd with many non-attorneys and in which legal advice is not sought or provided; email thread has dual purpose-primary purpose business operations (S-RAD launch/Phase 5 City holds). Uber should produce with appropriate redactions.	Privileged	Defendants have represented in their briefs and affidavits that this communication was sent for the purpose of obtaining and facilitating legal advice. Plaintiffs have not provided a sufficient basis to reach a different conclusion. Additionally, this document both seeks and conveys legal advice.
22	JCCP_MDL_PRIVLOG085508	Attorney-Client	Confidential e-mail thread seeking and providing legal advice from in-house counsel regarding in-app features to advance rider safety.	Yes. Email thread does not appear entirely privileged; thread includes emails in which attorney cc'd with many non-attorneys and in which legal advice is not sought or provided; email thread has dual purpose-primary purpose business operations (S-RAD launch/Phase 5 City holds). Uber should produce with appropriate redactions.	Privileged	Defendants have represented in their briefs and affidavits that this communication was sent for the purpose of obtaining and facilitating legal advice. Plaintiffs have not provided a sufficient basis to reach a different conclusion. Additionally, this document both seeks and conveys legal advice.

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23	JCCP_MDL_PRIVLOG085606	Attorney-Client	Confidential e-mail provided for purposes of seeking legal advice from in-house counsel regarding in-app features to advance rider safety.	Yes. Uber has withdrawn its privilege claim as to this same email/meeting invite six times and now improperly seeks to claw back an admittedly unprivileged communication. The email recipients include many non-attorneys, with a dominant business purpose relating to S-RAD program, a predictive model used for business purposes; redactions do not reflect legal advice being sought or given.	Not Privileged	Uber has previously withdrawn its claim of privilege on a substantially similar email chain with the same content. See JCCP_MDL_PRIVLOG005904. Uber is ordered to produce this document with the redactions removed.
24	JCCP_MDL_PRIVLOG085609	Attorney-Client	Confidential document memorializing request for legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes - redactions are improper, for the most part, as they do not seek or offer legal advice, but simply describe a business decision related to certain product targets. In the latter redaction that occurs on bates ending in 284 especially, the redacted portion directly concerns itself with the weighing of a business decision surrounding driver behavior and product feature inputs that would lead to the ultimate need for driving insights and business scaling. This document did not involve any legal counsel in its creation, either.	Produce with New Redactions	Only some of the redacted portions convey and reflect legal advice. Uber is ordered to produce this document with the redactions on p. 23 removed except for the first sentence in the second bullet, and with the redactions on p. 28 removed except for the second sentence in the redacted portion.
25	JCCP_MDL_PRIVLOG085614	Attorney-Client	Confidential e-mail thread provided for purposes of rendering legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes - this is a primary business purpose communication, in which nonattorneys are discussing safety product feature and technical analysis, attorney advice is never sought or given	Privileged	Defendants have represented in their briefs and affidavits that this communication was sent for the purpose of obtaining and facilitating legal advice. Plaintiffs have not provided a sufficient basis to reach a different conclusion.

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26	JCCP_MDL_PRIVLOG085617	Attorney-Client	Confidential e-mail seeking legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes. Uber has withdrawn its privilege claim as to this same email thread (see JCCP_MDL_PRIVLOG057200) and now improperly seeks to claw back an admittedly unprivileged communication. With the possible exception of the last redaction (following @Scott), does not appear legal advice sought or given; attorney added to cc line with non-attorneys; dominant business purpose (the "business case" for sharing S-RAD deck).	Not Privileged	The challenged redactions in this communication do not seek or convey legal advice. Additionally, Uber has withdrawn its privilege claim over the same chain and produced the document without redactions. See JCCP_MDL_PRIVLOG057200.
27	JCCP_MDL_PRIVLOG085634	Attorney-Client	Confidential chat discussing legal advice from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes - this communication is describing business decisions and outcomes that were implemented for safety product features. The primary purpose of the document is therefore a business purpose, and there is neither legal advice given nor sought, nor reflected in the redacted portions. In fact, it describes only a high level discussion that "legal was spoken to" but does not implicate any legal advice, and the substance of the discussion between two non-attorneys is squarely concerned with profit based up and downsides of implementing safety product features.	Produce with Uber's Proposed Redactions	The redacted portions reflect information sought by or provided to in-house counsel to facilitate the provision of legal advice. Uber's redactions are appropriate.
28	JCCP_MDL_PRIVLOG085637	Attorney-Client	Confidential document seeking and providing legal advice from in-house counsel regarding Uber's policies and practices for responding to allegations of driver sexual assault or sexual misconduct.	Yes - redactions are improper, for the most part, as they do not seek or offer legal advice, but simply describe a business decision related to certain product targets. In the latter redaction that occurs on bates ending in 733 especially, the redacted portion directly concerns itself with the weighing of a business decision surrounding driver behavior and product feature inputs that would lead to the ultimate need for driving insights and business scaling. Note, this is a nonattorney discussion about the business risks and benefits of implementing a safety feature.	Produce with New Redactions	Only some of the the redacted portions seek or convey legal advice. Uber is ordered to produce the document with the following: p. 24, remove the second redaction; p. 68, remove redaction starting with "but will delay"; p. 92, remove redaction from sub-bullet.

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29	JCCP_MDL_PRIVLOG085640	Attorney-Client	Redacted confidential document requesting information to facilitate rendering legal advice regarding in-app features to advance rider safety.	Yes- no legal advice being given or sought, this is entirely concerned with a business decision, and the document itself also was created with a primary and sole business purpose. Additionally, no attorney denoted as author or collaborator	Produce with Uber's Proposed Redactions	The redacted portions reflect requests from in-house counsel for information to facilitate legal advice. Uber's redactions are appropriate.
30	JCCP_MDL_PRIVLOG085642	Attorney-Client	Confidential document reflecting legal advice sought and received from in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes - this communication is describing business decisions and outcomes that were implemented for safety product features. The primary purpose of the document is therefore a business purpose, and there is neither legal advice given nor sought, nor reflected in the redacted portions. In fact, it describes only a high level discussion of members of the legal team and how they properly hit their performance goals related to the safety products being implemented.	Not Privileged	There is no indication that this document seeks or conveys legal advice. Uber has not met its burden to establish privilege.
31	JCCP_MDL_PRIVLOG085643	Attorney-Client	Redacted confidential presentation memorializing legal advice of in-house counsel regarding initiatives or campaigns to promote rider safety.	Yes- document is clearly a business operations document, and even those portions redacted seem to be primarily concerned with roadmap of feature rollouts and not to implicate either giving or seeking legal advice. No attorney denoted as author or collaborator	Produce with Uber's Proposed Redactions	The redacted portions contain an intent to seek legal advice. Uber's redactions are appropriate.
32	JCCP_MDL_PRIVLOG085646	Attorney-Client	Confidential presentation prepared at the direction of in-house counsel memorializing legal advice regarding initiatives or campaigns to promote rider safety.	Yes - no attorney denoted as author and only one attorney denoted as collaborator among numerous non-attorneys; document created for dominant business purpose for recurring committee meeting about safety promotions/relating to Uber's marketing/campaigns to promote safety. Uber has withdrawn its privilege claim as to several substantially similar iterations of this same document and should do the same here. See JCCP_MDL_PRIVLOG003576, JCCP_MDL_PRIVLOG003584, JCCP_MDL_PRIVLOG003589, JCCP_MDL_PRIVLOG003646, JCCP_MDL_PRIVLOG025324, JCCP_MDL_PRIVLOG004018.	Not Privileged	This document does not seek or convey legal advice. Uber has not met its burden to establish the document is privileged.

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33	JCCP_MDL_PRIVLOG085647	Attorney-Client	Redacted confidential e-mail providing legal advice from in-house counsel regarding media inquiry concerning reports of driver sexual assault or sexual misconduct.	Yes - This is a communication discussing how Uber will respond to media coverage discovering that Uber made a deal with a third party, Crawford, trying to buy out sexual assault survivors claims. Not only is the purpose of the communication concerned with a business decision to protect their brand and cover-up their conduct, but it discusses a public statement to be edited and at no point is input described of a legal nature. This discussion's primary and only purpose is a business decision, not a legal one. Additionally, as Crawford is a third party, and this communication is discussing their business dealings with Crawford, nothing being communicated here is outside of that third party's purview. In addition, Uber has previously withdrawn its claim to privilege as to the same contents it now seeks to claw back. See UBER_JCCP_MDL_003384126 (JCCP_MDL_PRIVLOG059933).	Not Privileged	Uber has previously withdrawn its claim of privilege on a substantially similar email chain with the same content. See JCCP_MDL_PRIVLOG059933. Uber is ordered to produce this document with the redactions removed.
34	JCCP_MDL_PRIVLOG085648	Attorney-Client	Redacted confidential chat discussing legal advice of in-house counsel regarding Uber's policies and practices for responding to allegations of driver sexual assault or sexual misconduct.	Yes-This document reflects chats between two non-lawyers about a "backgrounder" and "statement," including their impressions of the backgrounder statement, that was ultimately provided to USA Today and others, and was used in the publication of a USA Today article. While the chats reference two lawyers, these lawyers were not acting in a legal capacity, but rather a business capacity - responding to and drafting a press release to a publication.	Not Privileged	This communication does not convey or seek legal advice. Uber has not met its burden to establish the document is privileged.